



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

GK/KCB/DL/SMF
F. #2018R01401

271 Cadman Plaza East
Brooklyn, New York 11201

November 13, 2024

By Email and ECF

Jennifer Ann Bonjean
Bonjean Law Group, PLLC
303 Van Brunt Street
1st Floor
Brooklyn, NY 11231
(718) 875-1850

Imran H. Ansari, Esq.
Michael T. Jaccarino, Esq.
Arthur L. Aidala, Esq.
Aidala, Bertuna & Kamins PC
546 Fifth Avenue, Sixth Floor
New York, NY 10036
(212) 486-0011

Counsel for Nicole Daedone

Counsel for Rachel Cherwitz

Re: United States v. Rachel Cherwitz and Nicole Daedone
Criminal Docket No. 23-146 (DG)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery is being produced to you pursuant to the Protective Order in the above-captioned matter, entered on June 26, 2023, and signed by counsel on or about May 17, 2024 and September 9, 2024. ECF Dkt. No. 26. The following materials consist of documents and tangible objects:

- Communications and screenshots relating to OneTaste provided by Individual #36 (ONETASTE00259915-ONETASTE00259929);
- Reports and documents related to OneTaste financials provided by Individual #1 (ONETASTE00259930- ONETASTE00259950);
- JPMorgan Chase records relating to OneTaste (ONETASTE00259951- ONETASTE00260371);
- Records related to OneTaste from the California Employment Development Department and the New York Department of Labor (ONETASTE00260372-ONETASTE00260551);
- Executed Letter Agreement for Exclusivity provided by OneTaste (ONETASTE00260552-ONETASTE00260553);

- Search consent form signed by Individual #1 (ONETASTE00260584-ONETASTE00260585);
- FBI Receipt of property form related to property provided by Individual #1 (ONETASTE00260586-ONETASTE00260586);
- Chart of OneTaste subsidiaries provided by counsel for OneTaste (ONETASTE00260587-ONETASTE00260588);
- Communications related to OneTaste provided by OneTaste (ONETASTE00260589-ONETASTE00260590);
- Image advertising a OneTaste event (ONETASTE00260591);
- Image featuring Rachel Cherwitz and other OneTaste participants (ONETASTE00260592);
- Communication relating to OneTaste provided by Individual #32 (ONETASTE00260593-ONETASTE00260594);
- Document relating to OneTaste in San Francisco (ONETASTE00260595-ONETASTE00260599);
- Course material relating to OneTaste TurnON events (ONETASTE00260600-ONETASTE00260615);
- Transcript of OneTaste event (ONETASTE00260616-ONETASTE00260633);
- Alisha Price recording (ONETASTE00260634);
- Recorded statement by Rob Kandell concerning his time at OneTaste (ONETASTE00260635);
- Recording of OneTaste “Meetings with Master” video (ONETASTE00260636);
- Text message communications concerning OneTaste provided by Individual #15 (ONETASTE00260638-ONETASTE00260646);
- Handwritten journal entries and other written materials relating to OneTaste provided by Individual # 15 (ONETASTE00260637), which the government notes, in an abundance of caution, contain information which may be favorable to the defense;
- GROUPME communications concerning OneTaste provided by Individual #15 (ONETASTE00260649-ONETASTE00265445), which the government notes, in an abundance of caution, contain information which may be favorable to the defense;
- iMessage communications concerning OneTaste provided by Individual #15, (ONETASTE00265446-ONETASTE00265636), which the government notes, in an abundance of caution, contain information which may be favorable to the defense;

- Miscellaneous documents and photographs relating to OneTaste (ONETASTE00265638-ONETASTE00265845);
- Search warrant and affidavit executed on October 29, 2024 (ONETASTE00260554-ONETASTE00260583) and responsive materials seized from hard drive belonging to Individual #10 pursuant to the search warrant (ONETASTE00266260), which the government notes, in an abundance of caution, contain information which may be favorable to the defense; and
- Transcriptions of previously-produced videos relating to OneTaste (ONETASTE00265846-ONETASTE00266259).

You may examine physical evidence discoverable under Rule 16, including original documents and other materials, by calling me to arrange a mutually convenient time.

The government renews its request for reciprocal discovery from the defendants. Please note that the defendants' obligations under Fed. R. Crim. P. 16(b) include identification of "all non-impeachment exhibits [the defendants] intend to use in their defense at trial, whether the exhibits will be introduced through a government witness or a witness called by a Defendant." United States v. Napout, No. 15-CR-252 (PKC), 2017 WL 6375729, at *7 (E.D.N.Y. Dec. 12, 2017); accord United States v. Smothers, No. 20-CR-213 (KAM), 2023 WL 348870, at *22 (E.D.N.Y. Jan. 20, 2023).

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/
Gillian Kassner
Kayla Bensing
Devon Lash
Sean Fern
Assistant U.S. Attorneys
(718) 254-7000

cc: Clerk of the Court (DG) (by ECF) (without enclosures)